

TO: Federal Communications Commission

FROM: Richard L. Swain, KK8O

SUBJECT: RM-10867 Comments

DATE: March 25, 2004

I am in favor with the concept of the ARRL idea for restructuring the Amateur radio service but do not agree with the “grandfathering” of the Novice, Technician and Technician Plus licensees in to the General class of operators without first passing as a minimum the current written exam for that class.

The exams are not difficult to pass if a minimum effort is put in to studying for the exam. After all of the questions and answers are available and by reading through them several times, taking the on line practice tests on the internet a few times any one who can read can obtain a passing score.

In the past, when the incentive licensing issues were always directed at the General class operators. They were degraded several times in the past, taking away privileges in order to promote study for the next higher-class operator. This time the General class is being requested to be degraded by handing privileges not earned by those who would normally be required to take and pass a written exam.

Keep the Morris code requirement for the Extra class. The top license should be able to demonstrate the ability to operate the most basic of modes of operation. A little extra should be required for this license class.

I have no problem with the “grandfathering” of the Advance class operators into the Extra class at this time. Most have demonstrated the ability in radio operation and the technical requirements to hold that license class.

The band restrictions for all classes of license are about right but power requirements for the entry classes should be no more then 100 watts on any band.

I am in favor of keeping the Novice class as the entry license but permit limited voice and data operation is selected amateur bands such as 75 meters, 40 meters 15 meters and 10 meters. Give them full amateur privileges on 6 meters and above with a power restriction of 100 watts.

I am a life member of the ARRL and hold an Extra class amateur license. I do not believe the ARRL Directors and staff gave the issue enough thought but are attempting to keep membership levels up at the expense of “dumbing down” the requirements for most licenses.

Richard L. Swain (Signed)